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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America,

Plaintiff,

v.

DEREK MICHAEL TAGG

Case:2:15-mj-30440

Judge: Unassigned,

Filed: 09-18-2015 At 11:25 AM

CMP USA V. DEREK MICHAEL TAGG (LH)

Defendant(s).

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**CRIMINAL COMPLAINT**

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I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of 2002 to September 18, 2015, in the county of Macomb  
in the Eastern District of Michigan, the defendant(s) violated:

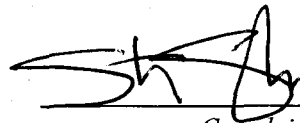
*Code Section**Offense Description*

18 U.S.C. Section 2252A(a)(5)

18 U.S.C. Section 2252A(a)(2)

Possession and access with intent view child pornography  
Receipt of child pornography

This criminal complaint is based on these facts:  
See attached affidavit.

☐ Continued on the attached sheet.*Complainant's signature*Task Force Officer Steven Showers, FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: September 18, 2015*Judge's signature*City and state: Detroit, MichiganR. STEVEN WHALEN, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT**

**INTRODUCTION**

I, Steven J. Showers, Task Force Officer with the Federal Bureau of Investigation (FBI), currently assigned to the Detroit Division, Macomb County Resident Agency, Clinton Township, Michigan, being duly sworn, depose and state as follows:

1. I have been employed with the City of Warren Police Department for over 17 years. I have been a Police Detective for approximately five years have investigated various crimes including homicides, narcotic activity, sexual assaults and crimes against children, including child pornography. During the course of these investigations, my duties have included writing search warrants, complaints and arrest warrants, participating in the execution of search warrants, the collection of evidence, interviewing subjects and witnesses of these cases, and testifying at various court proceedings. I am currently assigned to the Macomb Area Computer Enforcement (MACE) task force, which investigates criminal violations of both federal and state child pornography and child exploitation laws.

2. While working with the FBI, I have investigated federal criminal violations related to high technology or cybercrime, child exploitation, and child pornography. I

have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for DEREK MICHAEL TAGG for violations of 18 U.S.C. §§ 2252A(a)(2) and (a)(5)(B), which prohibit the receipt, possession, and access with intent to view of child pornography.

4. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that DEREK MICHAEL TAGG has violated 18 U.S.C. §§ 2252A(a)(2) and (a)(5)(B).

5. Through an investigation conducted by the FBI and the MACE task force, on September 18, 2015, a federal search warrant was executed at DEREK MICHAEL TAGG's residence in Warren, Michigan. The search warrant was obtained based on information that led investigators to believe that TAGG was accessing files from a website known to contain child pornography. The website also facilitated anonymous

communication among its users. In order to access this website, TAGG used a username<sup>1</sup> that he has since identified as his own, and a log-on name of "derek." Using this username and log-on name, TAGG accessed multiple website postings that included depictions and discussions of sexual acts involving children. Specifically, TAGG accessed a post that contained a link to an image that depicted thumbnails of a video in which a prepubescent girl performs oral sex on an adult male penis, and then is anally penetrated by the adult male.

6. TAGG was present at his home during execution of the federal search warrant on September 18, 2015. TAGG was interviewed by your affiant and FBI Agent Danielle Christenson. During the interview, TAGG made the following statements:

- a. TAGG stated that he had been viewing and downloading child pornography for approximately 13 years.
- b. TAGG stated that he downloaded all of the child pornography that he could find from the internet, and estimated that his collection of child pornography contained at least 20,000 files.
- c. TAGG stated that when he got a new computer, he transferred his collection of child pornography to an external hard drive located in his home.

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<sup>1</sup> TAGG's username is known to law enforcement, but not included in this criminal complaint in order to

- d. TAGG admitted that he masturbated while viewing child pornography.
- e. TAGG repeatedly referred to his interest in child pornography as “an obsession.”
- f. TAGG admitted that he was a user of the website described above in paragraph 5. He acknowledged that he used the username known to law enforcement.

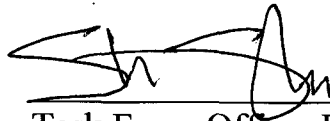
7. During the search of TAGG’s home, law enforcement seized electronic evidence, including an external hard drive, laptop, and desktop computer. An on scene preview of TAGG’s laptop revealed videos of child pornography. Your affiant viewed one such video, and saw that it depicted the lascivious exhibition of the genitals of a prepubescent girl.

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protect an ongoing investigation.


**CONCLUSION**

8. Based upon the foregoing, there is probable cause to believe that TAGG has knowingly received, possessed, and accessed with intent to view child pornography in violation of 18 U.S.C. §§ 2252A(a)(2) and (a)(5)(B). Accordingly, your Affiant requests that this Court issue an arrest warrant.



Task Force Officer Detective Steven Showers  
Federal Bureau of Investigation

Sworn to me this 18th day of September, 2015



R. STEVEN WHALEN  
United States Magistrate Judge